This proposal is based on several points that are, well, not true. To state that morse code capability doesn't improve the Amateur Radio Services usefulness in emergency communications is wrong. The authors contention that new digital weak-signal techniques work better than cw is untrue. There are still conditions where cw works better than JT-44, PSK-31, and others mentioned in the petition. The comment that phone gear is more available and similarly priced as cw gear is wrong. There are many cw rigs available for much less than phone equipment. If one looks at recent disaster and emergency communications events, phone and cw operations predominate. CW, by reason of it's simplicity, often saves the day when disaster drastically reduces power availability. When forced to operate from batteries or other limited power sources, it may not be wise to run a computer for these other weak-signal modes when under almost all conditions a plain old low power cw signal will do the job. Bottom line: cw IS the most cost and power effective means of reliable emergency communication, and it's simplicity lends higher reliability than all the other modes mentioned by the petitioners. Finally, the authors state that the no-cw licenses at VHF and above

Finally, the authors state that the no-cw licenses at VHF and above has not created any enforcement problems. What does that have to do with the merit of requiring cw as an important skill for a pool of emergency and disaster communicators? In fact, cw proficiency has hurt our capability as emergency communicators at VHF. When the long term power outages of a real disaster use up the battery back-up systems of our repeaters, we'll all see that the vhf ops with ssb and CW can communicate much farther and more reliably than the folks with their (now simplex) FM sets. Emergency communications is usually about sending messages. Go listen to a message traffic net on 75m SSB during a high QRN event (many summer nights), then listen to the same message passed on the CW net - you'll see how much faster the cw msg gets passed through high noise conditions. All this with rigs that ARE available for less cost than phone rigs.

Since emergency communications are the reason for our existance, shouldn't a mode of operation that works so well as cw be at least a minimal requirement? Yes, I say, even on VHF and above.